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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

AUG - 9 2016

SEAN F. McAVOY, CLERK
DEPUTY
YAKIMA, WASHINGTON

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAMES LEE CROOKER,

Defendant.

1:16-CR-02055-RMP-1
INDICTMENT

Ct. 1: 18 U.S.C. § 2251(a)
Production of Child Pornography

18 U.S.C. § 2253
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

On or about May 25, 2016, in the Eastern District of Washington, the Defendant, JAMES LEE CROOKER, did knowingly employ, use, persuade, induce, entice, and coerce Minor F., to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of 18 U.S.C. § 2251(a).

NOTICE OF CRIMINAL FORFEITURE

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of offense(s) as alleged in Count 1 of the Indictment, the Defendant, JAMES LEE CROOKER, shall forfeit to the United States of America any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and, any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property.

If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

DATED: August 9, 2016

A TRUE BILL


Presiding Juror

MICHAEL C. ORMSBY
United States Attorney


THOMAS J. HANLON
Supervisory Assistant United States Attorney


LAUREL J. HOLLAND
Assistant United States Attorney